

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA, DIVISION

JOHNNY BRADFORD,

Plaintiff,

v.

TRAVELERS CASUALTY &  
SURETY CO. OF AMERICA

Defendants.

CIVIL ACTION

FILE NO. \_\_\_\_\_

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that the Defendant TRAVELERS CASUALTY & SURETY CO. OF AMERICA being ALL Defendants named in this action, hereby removes to this Court the State Court action described below and respectfully shows the Court the following:

1.

A civil action was filed by the above-named Plaintiff Johnny Bradford in the State Court of DeKalb County, State of Georgia, naming as the Defendant Travelers Casualty & Surety Co. of America, being Civil Action File No. 19A78184, the Summons and Complaint in said civil action being attached hereto as Exhibit "A" and the Answer of Defendant is attached hereto as Exhibit "B".

2.

At the time of the filing of the Complaint, the Plaintiff was a citizen and resident of the State of Nevada.

3.

At the time of the filing of the Complaint, Defendant Travelers Casualty & Surety Co. of America was a foreign corporation incorporated in the State of Connecticut, with its principal place of business located in the State of Connecticut.

4.

The Plaintiff seeks judgment against the Defendant in sums in excess of \$75,000.00 exclusive of interest and costs, with respect to alleged medical expenses, lost wages, both past and future, pain and suffering and mental anguish,

and expenses. Plaintiff alleges recovery for Personal injuries; Past, present and future pain and suffering; Disability; Mental anguish; Loss of capacity for the enjoyment of life; Economic losses; Incidental expenses; Past, present and future medical expenses; Lost earnings; Loss of earning capacity; Permanent injuries; Consequential damages. Plaintiff has also furnished Defendant with a list of medical bills and lost wages claimed in this case that exceed the sum of \$75,000.00.

5.

The foregoing action is properly removable to this Court pursuant to 28 U.S.C. § 1441(a), 28 U.S.C. § 1446(a) and (b) and, in accordance with 28 U.S.C. § 1332(a), there being diversity of citizenship between the plaintiff and all of the defendants and the matter in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00.

6.

Now, within thirty (30) days after receipt by a defendant of a copy of the Summons and Complaint filed in the State Court of DeKalb County, State of Georgia, notice is hereby given in accordance with 28 U.S.C. § 1446 and pursuant to Rule 11 Federal Rules of Civil Procedure, of the removal of said action to this Court.

/s/ RONALD R. COLEMAN, JR.  
RONALD R. COLEMAN, JR.  
Georgia Bar No.: 177653  
Attorney for Defendant

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Sandy Springs, GA 30328  
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Pursuant to N.D. Ga. Local Rules 5.1(B) and 7.1(D), I hereby certify that this document is submitted in Times New Roman 14 point type.